

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,
Plaintiff,

– against –

Collector’s COFFEE, INC. (d/b/a
Collector’s CAFÉ), and MYKALAI
KONTILAI,
Defendants.

Civil Action No.
19-CV-04355 (LGS)(GWG)

SDJ INVESTMENTS, LLC; ABODE
INVESTMENTS, LLC; AND DARREN
SIVERTSEN, TRUSTEE OF THE
SIVERTSEN FAMILY TRUST U/A/D
10/01/2002,
Intervenor-Plaintiffs,

– against –

Collector’s COFFEE, INC. (d/b/a
Collector’s CAFÉ), MYKALAI
KONTILAI, LOS ANGELES DODGERS LLC,
DOE INDIVIDUALS 1 THROUGH 50 AND
ROE CORPORATIONS 1 THROUGH 50,
Intervenor-
Defendants.

**EXHIBIT 1 TO
COLLECTOR’S COFFEE, INC.’S MOTION TO COMPEL
PRODUCTION OF NOTES AND SUMMARIES OF RECENTLY DISCOVERED
WITNESS INTERVIEWS CONDUCTED DURING THE SEC FACT FINDING
INVESTIGATION**

**SECURITIES AND EXCHANGE COMMISSION'S
PRIVILEGE LOG**

May 26, 2020

SEC v. Collector's Coffee, et al.

Case No. 19-cv-4355-LGS-GWG

Category No.	Document Date(s)	Description Of Documents Or Categories Of Documents	Authors And Recipients¹	Privilege Asserted, Or Other Reason For Withholding Or Not Producing²
1	Approximately May 22, 2017, to present	<p><i>SEC Internal Work Product From Its Investigation and Litigation of This Matter.</i></p> <p>SEC internal documents prepared in anticipation of litigation or for trial, or for the purpose of seeking or providing legal advice, or including pre-decisional deliberations on actions that might be taken with regard to this case and the investigation that preceded it, including memoranda, outlines, notes, drafts, summaries, research, analyses, reports, charts and spreadsheets, internal forms, emails, compilations of materials, presentations, notes or memoranda of conversations, and calendars. These documents include analyses of the information collected during the</p>	Authored and transmitted by and among SEC Division of Enforcement attorneys, officials and personnel (or contractors) assisting them, including but not limited to Terry Miller, Mark Williams, Gregory Kasper, Jacqueline Moessner, Mary Brady, Adam Ross, and personnel from other SEC Divisions or Offices, including the Office of International Affairs, the Office of the Whistleblower and the Commissioners and their staff.	WP, AC, DP, LE, Common Interest

¹ Items listed in this privilege log might also have been shared internally with other SEC staff who are not necessarily listed here.

² this index contains assertions of, among other privileges and protections, the Attorney-Client Privilege ("AC"), Work Product Protection ("WP") (including protection under Rule 26(b)(3)(A) and (B), and the common law work product doctrine), Deliberative Process Privilege ("DP"), Law Enforcement Privilege ("LE"), and Common Interest Privilege ("Common Interest").

Category No.	Document Date(s)	Description Of Documents Or Categories Of Documents	Authors And Recipients ¹	Privilege Asserted, Or Other Reason For Withholding Or Not Producing ²
		<p>investigation and discovery in this case and notes and memoranda from witness interviews.</p> <p>The documents reflect internal communications, opinions, mental impressions, and gathering of information by SEC attorneys, officials and personnel (or contractors) assisting them in evaluating possible violations of securities laws and rules, and possible claims to be filed. The documents also reflect the SEC's communications with other law enforcement authorities regarding possible violations of laws and rules, and possible claims to be filed.</p>	The documents were distributed only within the SEC.	
2	Approximately May 22, 2017, to present	<p><i>Other U.S. Government Agency Communications.</i></p> <p>Requests for information, memoranda, letters or other communications or work product prepared in anticipation of litigation or for trial, and exchanged between the SEC and other United States government agencies, including law enforcement agencies, regarding the subject matter of this action.</p>	<p>SEC attorneys, officials, and personnel (or contractors) assisting them, including Terry Miller, Mark Williams, Gregory Kasper, Jacqueline Moessner, and Mary Brady.</p> <p>Attorneys, officials and personnel (or contractors) assisting them from the Department of Justice and the Federal Bureau of Investigation</p>	LE, WP, Common Interest